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# **Table 6 – Driving History**

Project	Location	Product (D	Length (# of Piles)	Hammer	Helmet	Shoe
Test 1a	DE	12-2	60' (1)	MKT983 (air)	none	Hollow
Test 1b	DE	12-3	60' (2)	MKT9B3 (air)	none	Hollow
Test 2a	DE	12-3	20' (1)	ICE30S (diesel)	std. pipe pile head	Flat plate
Test 2b	D€	12-3	45' (1)	ICE30S (diesel)	std. pipe pile head	Flet plate
Cape May-Lewes Ferry Terminal	DE	12-3	65" (18)	(CE812 Vibro	Timber clamp	Hotlow
FL Meyers Commercial Piers	FL.	18-3	55' (27)	Delmag D-12	std, pipe pile head	Hollow
Private Marina	WA	12-3	39' (3)	Drop hammer	std. pipe pile head	Conical
Atlantic Highlands Marina	KN	12-3	30' (30)	ICE520-30	Sheet pile head	Flat sheet
Atlentic Highlands Marina	KU	12-3	40' (10)	ICE520-30	Sheet pile head	Flat sheet
Delaware River and Bay Authority	DE	18-4	70' (55)	ICE 416 Vibro	std. pipe pile head	Hollow
Delaware River and Bay Authority	נא	MP-603	80' (1)	ICE4430 (diesel)	Steel mandrel	Hollow
Delaware River and Bay Authority	NI	MP-72 <sup>3</sup>	80' (1)	ICE44 Magru (diesel)	Steel mandrel	Hollow
Asbury Park Outfall	KU	18-3	26' (38)	Not yet driven		]
Astrury Park Outfall	Ŋ	18-4GC <sup>4</sup>	27' (66)	Not yet driven		
Long Branch Outfall	M	18-3	24' (64)	Berming- hammer 3505 (diesel)	Steel mandrel	Contral
Long Branch Outfall	N	18-4GC	27' (104)	Berming- hammer 3505 (diesel)	Steel mandrel	Conical

Go and 72 diameter Monopile
 Glass/Carbon fiber hybrid

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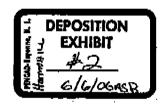
#### SPECIFICATION FOR FRP COMPOSITE PILES

#### 1. DESCRIPTION

This work shall consist of furnishing and installing FRP Composite Piles. This work will include all equipment, materials, labor and all else necessary to install the piles as shown on the plans. See plan documents for a pile schedule specifying quantity, diameter, length and other requirements unless included in specification.

#### 2. **MATERIALS**

- FRP Composite Tube 2.01
  - FRP composite tube shall be fabricated of high-strength, fiber-reinforced A. composite materials by means of VARTM (Vacuum Assisted Resin Transfer Molding). The piles shall be manufactured with vinyl ester resin and stitch bonded fabric reinforcement. The minimum fiber content by volume shall be no less than 50%. Composite tube shall meet all material and performance specifications cited in this document. Composite tube shall be produced by Hardcore Composites (New Castle, DE) or Engineer pre-approved equal.
  - FRP Composite tube shall be coated with either a minimum 6 mil thick epoxy B. coating or a minimum 30 mil thick acrylic coating depending on the project requirements. [Engineer to specify].
    - Epoxy Coating (standard). Coating shall be no less than 6 mils in dry 1. film thickness and offer the following material properties. The coating shall achieve a direct impact resistance rating of no less than 95 psi using ASTM D2794. The abrasion resistance shall be no less than 80mg loss per ASTM D4060 using a CS17 wheel at 1000 cycles at a load of 1 kg. The pencil hardness of the coating shall achieve a minimum rating of F-H per ASTM D3363. The Salt fog resistance shall show no cracking, softening, or delamination per ASTM B117 at 750 hours.
    - Acrylic Coating. Coating shall be no less than 30 mils in dry film 2. thickness and offer the following material properties. The water absorption weight gain for a 24 hour immersion is than 0.4 percent per ASTM D-570. The water permeability at 37.5°C and 100 percent relative humidity is 20.3 (g-mil)/(100 in<sup>2</sup> \* day). The gas permeability of O<sub>2</sub> at 23°C and 0 percent relative humidity is 33 (cc-mil)/(100 in2\*atm\*day). The Izod Notched impact resistance is 1.1 ft-lb./in. of notch at 73°F and 0.44 ft-lb./in. of notch at 32°F per ATSM D-256.



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## FRP COMPOSITE PILES

- C. FRP composite tubes shall be manufactured with a textured, inner surface. The textured surface will provide a mechanical lock between the tube and filler material, typically concrete. This mechanical lock will minimize slippage between the composite tube and filler material.
- D. FRP composite tubes shall have a minimum wall thickness as follows:

PRODUCT IDENTIFICATION	NOMINAL O.D. (in)+/-0.5"	WALL THICKNESS (in)
10-2	10	0.182
12-2	12.75	0.182
12-3	12.75	0.273
14-3	14	0,273
18-3	18.13	0.273
18-4	18.13	0.364
24-3	24	0.273
24-4	24	0.364

#### 2.02 Concrete Infill

- Concrete infill for FRP Composite Piles shall conform to applicable state or federal specifications.
  - 1. The 28 day compressive strength shall be no less than 4,000 psi.
  - 2. Non-shrink admixtures shall be utilized in the mix design to assure that a mechanical lock is established between the composite tube and concrete infill.

### 2.03 FRP Composite Pile

A. The FRP Composite Pile, including 4,000 psi compressive strength concrete infill, shall offer ultimate stiffness and moment capacities as shown in the table below.

PRODUCT	NOMINAL	BENDING	BENDING
IDENTIFICATION	O.D.	STIFFNESS', EL	MOMENT <sup>2</sup>
	(în)	(Tb-in²)	(in-lb)
10-2	10	4.49 x 10 <sup>1</sup>	1.15 x 10 <sup>6</sup>
12-2	12.75	9.78 x 10 <sup>2</sup>	2.04 x 10°
12-3	12.75	1.38 x 10°	2.80 x 10 <sup>6</sup>
14-3	14	1.76 x 10°	$3.43 \times 10^6$
18-3	1.8.13	4.59 x 10°	5.66 x 10°
18-4	18.13	5.78 x 10 <sup>9</sup>	7.60 x 10 <sup>6</sup>
24-3	24	I.05 x 10 <sup>10</sup>	1.01 x 10 <sup>7</sup>
24-4	24	1.34 x 10 <sup>10</sup>	1.29 x 10 <sup>7</sup>

- 1. Bending stiffness calculated at 20% of ultimate bending moment
- In practice, piling should not be used at its ultimate moment capacity. A factor of safety should be
  used. It is recommended that piling be stressed up to 20% of ultimate moment capacity.
  However, the appropriate factor of safety may vary at the designer's discretion for particular
  applications.
- 24 inch diameter pile flexural data based on extrapolation of experimental data.

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### FRP COMPOSITE PILES

#### CONSTRUCTION DETAILS 3.

- FRP Composite Piles shall be installed using industry standard methods including impact hammers, vibratory hammers and jetting. The piles shall be driven either hollow or with concrete infill depending on the site-specific geotechical conditions. The piles can also be driven either open ended or with a driving shoe as provided by Hardcore Composites. A standard pipe pile driving helmet or equivalent is used in most applications. [The method of installation and maximum allowable driving stresses shall be specified by the Engineer of Record].
- Once the piles are installed, piles shall be cut at the cut-off elevation shown on the 3.02 plans. Cutting shall be performed by sawing or other means as approved by the Engineer of Record to provide a smooth level cut.
- Depending on the physical properties required, piles may be left unfilled. If the 3.03 project requires the piles be filled, soil and water shall be removed from the inside of the pile to below the point of fixity or as specified by the Engineer of Record. Concrete shall then be tremmie placed into the pile in a manner approved by the engineer. [Engineer to determine whether filled or unfilled piles are required].
- When submitting shop drawings for approval, the provisions of the applicable state 3.04 or federal specifications shall apply, with the following modifications:
  - The Contractor shall submit the following shop drawings and supporting **A**.. information for approval:
    - Proposed FRP composite tube, including bending stiffness and bending moment, concrete specification and certification of compliance with this specification.
    - Proposed concrete mix design, verifying compressive strength and ii. shrinkage compensation.
    - Details for driving helmets, cap blocks and pile cushions and iii. recommendations for pile driving equipment.
    - Handling, transporting and storing recommendations for composite îv. piles.
    - Proposed concrete supplier. v.

#### METHOD OF MEASUREMENT 4,

The quantity of piles to be paid for under the work specified for FRP Composite Piles will be the number of linear feet of piles placed in the leads, and installed in accordance with the plans and this specification. No additional measurement for payment will be made for redriving of piles that are forced up by any cause.

#### 5. BASIS OF PAYMENT

#### FRP COMPOSITE PILES

- 5.01 The unit price bid per linear foot for each of the respective FRP Composite Pile items shall include the cost of furnishing all labor (including the manipulation of pile driving equipment and materials), materials, and equipment necessary to complete the work as prescribed in these specifications. No payment will be made for piles rejected in accordance with the requirements listed under sections regarding Defective Piles of the applicable state or federal specifications.
- 5.02 Payment will be made under:

<u>Item No:</u>	<u>Description</u>	<u>Pay Unit</u>
10-2	FRP Composite Pile (2-ply), 10" Dia.	LF
12-2	FRP Composite Pile (2-ply), 12" Dia.	ĹF
12-3	FRP Composite Pile (3-ply), 12" Dia.	LF
14-3	FRP Composite Pile (3-ply), 14" Dia.	LF
18-3	FRP Composite Pile (3-ply), 18" Dia.	LF
18-4	FRP Composite Pile (4-ply), 18" Dia.	LF
<b>24</b> –3	FRP Composite Pile (3-ply), 24" Dia.	$\mathbf{LF}$
24-4	FRP Composite Pile (4-ply), 24" Dia.	LF
	- · · · · · · · · · · · · · · · · · · ·	



**Hardcore Composites** 

618 Lambsons Lane / New Castle, DE 19720 Phone: 302.442.5900 / Fax: 302.442.5901

www.hardcorecomposites.com

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→ Donna **☑** 007/046

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→ Donna

**₫** 008/046

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# **Hardcore Composites**

Hardshell Composite Pile Strengthening Jackets



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# **Applications**

#### Composite Jackets



### Repair of Timber Piles

 Provides structural strengthening and restores lateral and vertical load carrying capability



 Ideal when overdriving with hollow pile is not possible due to the presence of super structure.

## Seismic Upgrade of Concrete Bridge Columns

Hardshell Composite Pile Strengthening Jackets have been tested and approved by Caltrans for seismic upgrade retrofits of concrete bridge columns. This system provides an effective method of adding structural hoop confinement where seismic instability is a concern.



# Containment & Protection

Hardcore FRP
Composite Shells are an excellent form in which to pour grout when a badly deteriorated concrete or steel structural member needs repair. In such cases, the composite shell offers the additional benefit of enhanced structural performance, long term impact / abrasion, protection and an aesthetically pleasing appearances.

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# **Advantages**

## Composite Jackets

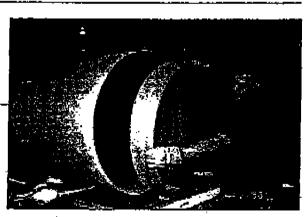
## Prefabricated Quality Assurance

Prefabricated composite shapes provide consistent, repeatable strength and quality that is not dependent on site fabrication labor.

## Superior Strength Characteristics

Vacuum infusion manufacturing process yields extremely high fiber volume content, providing more than twice the strength capabilities of conventional wet lay-up processes. Factory quality

control assures that specified fiber and strength orientation is achieved before the shapes leave the plant.



#### Marine Installation

Unlike traditional "wet wrap" methods that are not feasible for marine applications, the easy to install prefabricated Hardcore Composite Shells can be installed below the water line. This makes marine protection and rehabilitation projects much more cost effective.

### Offset Capability

The uniqueness of Hardcore Composite Shapes permit offset positioning on columns to repair a variety of structural surface contours including damaged or uneven substrates.

#### Rapid Installation

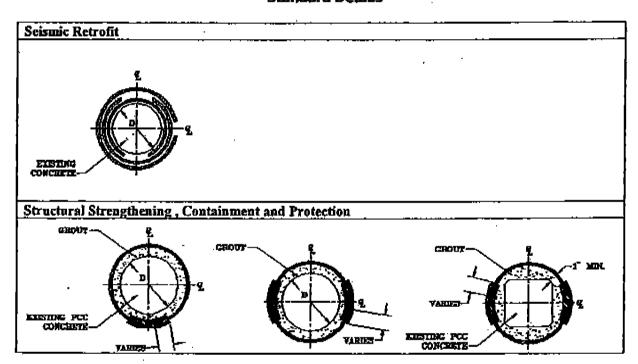
A complete installation can takes as little as a few hours to accomplish, making the Hardcore Composite System an ideal solution for fast track repair projects.

## Corrosion Protection

Composite jackets provide a barrier to the intrusion of moisture to the substrate that is particularly effective in the splash zone.

# **Specific Details and Installation**

#### Standard Details



<sup>\*</sup> Custom shapes and sizes are available

#### Installation Sequence

#### 1. Prepare Column

Before installation of the Handcore Composite System, the underlying concrete must be free of defects or corrosion. Perform any necessary repairs.





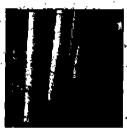
#### 3. Position Jackets

Once the gasket seam of the Hardcore shell has been coated with epoxy adhesive, it is stretched open and positioned. Depending on the design objectives, multiple overtapping jackets may be Installed.

#### 2. Apply Adhesive

For offset installations, adhesive is applied to the connector seam. For applications where the jacket is designed to be installed in direct contact will be substrate, achesive is applied to inner surface of the **lacket** 





#### 4. Strap Jackets in Place

A simple beiting system is cinched around the jackets and tightened for eight hours. After the adhesive has cured and grout (if specified) is poured, the straps are removed. The composite system with factory applied aesthetic finish is ready fer SETVÎCE.

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# **Factory Assured Fiber Orientation**

## Shell Properties Defined by Fiber Orientation

Typical Application	Unidirectional	Multi Axis 0 +/- 45 90	Enhanced Multi Axis 0 +/- 45 90	
	Composite	Composite	Composite	
	2777.1	QM	028	
Seismic Retrofit	X `.	•		
Structural Strengthening				
Shear Enhancement		· · · · · · · · · · · · · · · · · · ·	X	
Improved Bending Performance			X	
Timber Pile Repair			X	
Containment & Protection		Х		
Flat Wall & Other Geometries				
Impact/Blast Resistance	· · · · · · · · · · · · · · · · · · ·	X	-	

# Hardshell Physical Properties

<u> </u>					
Property	Reference Standard	Uni-Directional	Multi Axis 0+/- 45 90	Enhanced Multi Axis 0+/- 45 90	Bi-Directional
		Composite	Composite	Composite	Composite
Haran Bass		11.71 4-1-5	QM 6468	स्कृति स्व	W.B. 1400
Ultimate Tensile Strength (min.) Primary Axis	ASTM D 3039	90,000 psi	63,000 psi	74,000 psi	57,800 psi
y-y Axis	i	10,000 psi	47,000 psi	35,000 psi	60,560 psi
Tensile Modulus (min.) Primary Axis	ASTM D 3039	5,000 ksi	3,750 ksi	4,100 ksi	3,100 ksi
y-y Azis		450 ksi	2,360 ksi	1,960 ksi	3,400 ksi
Ultimate Tensile Strain (min.)	ASTM D 638	2.0%	1.8%	1.8%	1.8%
Fiber Volume Fraction (min.)	ASTM D 3171	50%	50%	50%	50%

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# Leading the World in large-scale Composite Structures

Hardcore Composites is focused on the infrastructure. Our products, systems and components are found in a diverse range of large-scale engineered structures including bridges and walkways, marine fender systems and specialty composite stay-in-place forms. Our customers include Department of Transportation (DOT), Marine and Commercial Construction interests.

Dedicated to providing the Optimum solution for our clients, Hardcore Composites employs a staff of diversified engineers with proficiency in composites, structural analysis, marine engineering and construction. This team is capable of developing engineered solution to real-world challenges. Our design build approach considers the whole construction dynamic, through each step in the critical path process-from design through installation.

We have earned a reputation for combining state of the art analytical tools and expertise with a creative approach to value engineering. The results of this are improved systems, structures that function well and are installed quickly.

## Hardcore Composites has achieved national recognition in the following areas:



Composites Institute

1995 - Project of the Year/ Development for Marine Fenders

1996 - Award for Excellence for Marine Fender System

1996 – Award for Excellence for Hardshell Concrete Repair System



Dow Chemical

1997 - Fabricator Excellence Award for Magazine Ditch Bridge 1999 - Fabricator Excellence Award for Longbranch, NJ Outfall

2000 - Fabricator Excallence Award for Composite Monopile



Delaware DOT

1998 — Outstanding Bridge project Febricator Award for Bridge

over Muddy Run



Civil Engineering Research Foundation

1999 - Charles Pankow Award/Finalist

Nominated by New York State DOT for Bennett's Creek Bridge

2000 - Charles Pankow Award

Nominated by New York State DOT for Bentley's Creek Bridge



Hardcore Composites

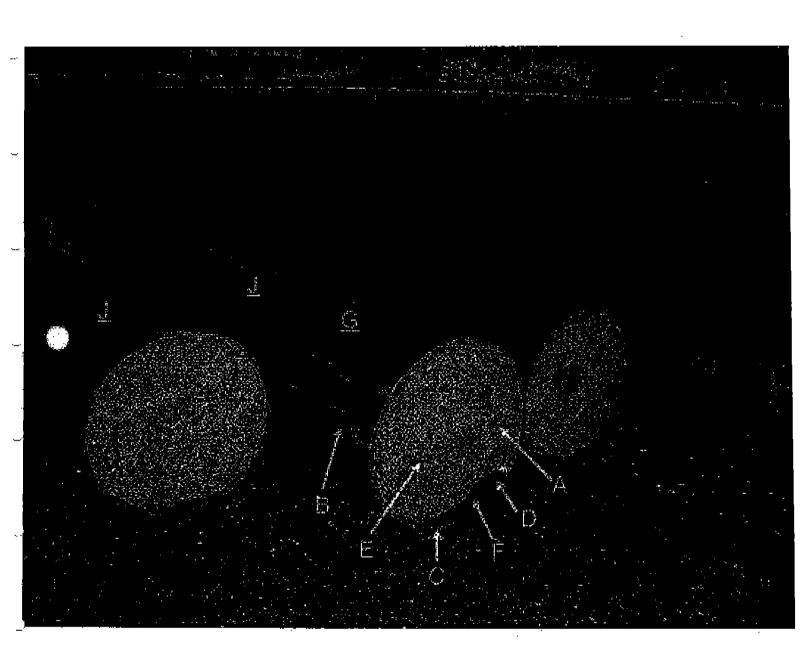
618 Lambsons Lane / New Castle, DE 19720 Phone: 302.442.5900 / Fax: 302.442.5901

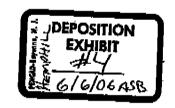
www.hardcorecomposites.com

HC M004 Hardshell Jackets, August 2000

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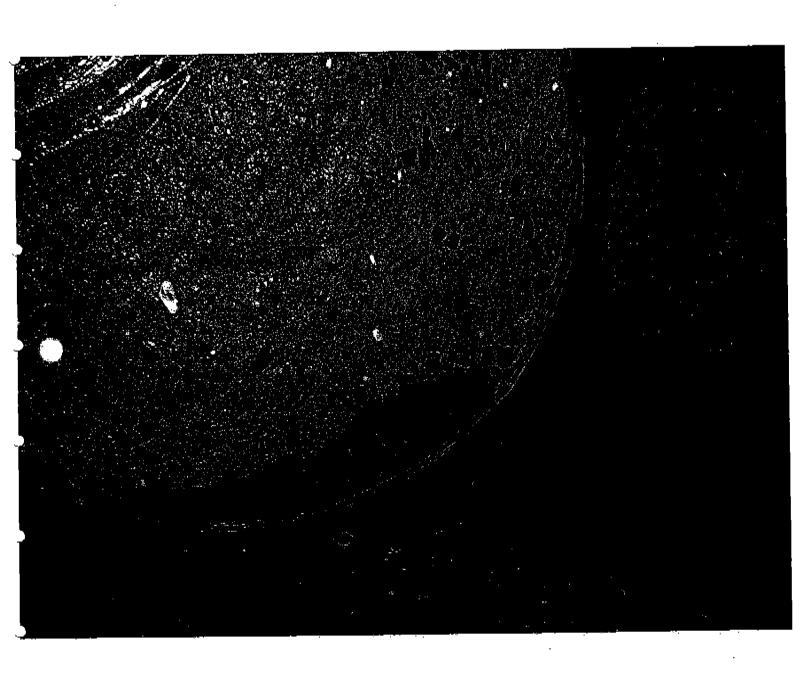
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—Sep. 15. 2004° 1:17PM=⇒r=E. I. C. Associates1904

TO: 197:331No. 0175



**Hardcore Composites** Operations LLC 618 Lambsons Lane New Castle, Delaware 19720

Quote No: 0091504-1

Quote prepared by: Jeff Pote, Hardcore Composites

	· · · · ·	<u> </u>		
QUOTE DATE		F.O.B.		TERMS
Wednesday, September 15, 2004	**,	Job Site		Y.O.D.
			· ·	1.

YTTMAUD	DESCRIPTION	UNIT PRICE	AMOUNT
4,485 lin. ft.	10° OD x 2-ply Hardowe Composite pile with 0.18" thick structural wall. Includes a 12.75° OD x 1.16°	\$26.25 / ft.	\$117,731.25
(69 piles (8 65°)	to protect the top portion of the pile from shorting		
	due to vessel contact. Pile will be filled with concrete prior to shipment to Jobsite. HDPE wear sleeve will be shipped separately. Contractor must place HDPE	4 4 4 4 2 2	
	asseve after pile is driven to the required clevation.		
	Ouoted pile well exceeds both the bending moment and bending stiffness (EI) of comparable diameter. Lancaster Composite pile. Independent laboratory floxural lest results from Lehigh University attached.		
10 Truckloads	Freight estimate - Extended trailers and excerts required. Pile weight is estimated at 85 lbs/ft OR 5,525 lbs/pile. Seven (7) piles per truckload.	\$1,100/e2	\$11,000.00
		TOTAL	\$128,731.25

Quote valid for 30 days.
 Soles tax extra as applicable.
 Availability: To meet construction schedule.

Copy to Scott Hemphill, Hardcore Composites

Thank you for the opportunity to quote this project!

Exhibit E

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Hardcore Composites
Operations LLC
618 Lambsons Lane
New Castle, Delaware 19720
302-472-0815 Fax 302-472-0816

Quote	ì	O.	•		
				13	LZ.

[ˈroject:

Quote prepared by: Jeff Pote

-	QUOTE DATE	F.C.B. POINT	TERMS
١	8/0/04	Nev/ Castle, DE	20% Down, Net 30 for completed,
ı			stored materials

QU	WITTY	DESCRIPTION	UNIT PRICE	AMOUNT
	360-B	16-5 FRP Ple		
(84 pl	ы @ 40- <b>п</b> )			
	4	Composite SIP Forms		
'. '.		g.		
	4.			
			SUBTOTAL	
			TAXES	0.00
			TOTAL	

			dave

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	_				
		 	=	od Slave	
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Hardcore Composites
Operations LLC
618 Lambsons Lanc
New Castle, Delaware 19720
302-472-0816 Fax 302-472-0816

Quote: fa.

To:



Quote prepared by: Jeff Pote

QUOTE DATE 7/27/04		E DATE	DATE F.().B. POINT		TERMS		
		7/04	New Castle, DE	30% Down, Ne	t 30 upon deliven		
QU	MITTY		DESCRIPTION	UNIT PRICE	AMOUNT		
	128-A s @ 38-M	10-2 FRP Pile Piles meet mink follows:	mum structural requirements as	***************************************			
		- Wall Thickne	ess 0.18-in mirimum				
		- 10-in Nomin	al Diameter				
	· 	- Exterior Coa customer rea	at to be Black Epoxy Paint unless. quests a different color				
н	0 R	12-2 FRP Pile	*		_		
(10 pl rs	@ 40-m	follows:	num structural requirements as				
		- Wall Thickne	≤s 0.18-in mirimum				
		- 12-in Nomina	ul Diarneter				
<u> </u>	<u> </u>	- Exterior Coal customer req	l to be Black Epoxy Paint unless uests a different color				
ž 12	B-6	10-2 FRP Pile					
(56 pl 15 (	@ 38-m)	Piles meet minim follows:	um structural requirementa as		2 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2		
		- Filled with 5.0	100 psi concrete				
$T_{-2,p}$		<ul> <li>Wall Thickness</li> </ul>	s 0.18-in minimum	and the state of			
		- 10-in Nominal	Diameter				
		<ul> <li>Exterior Coat to customer requirements</li> </ul>	io be Black Epoxy Paint unless ests a different color				
40-	ft.	12-2 FRP Pile					
8 plist@	40-03	Ples meet minknu ollows:	m structural requirements as				
. € ,	. ]-	Filled with 6,00	0 psi concrete				
	· · · · · · · · · · · · · · · · · · ·	Wall Thickness	9.18-in minimum		`		
		12-in Nominal I	Diameter				
	-	Exterior Coat to customer reque	sts a different color				

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-				•		
2	Shipping (Not Filled)			4		
(Truc : Londs)						
7	Shipping (Filled)		•	-		
(Truc : Loeds)						
			· · · · ·		SUBTOTAL	NA ·
		•	÷		TAXES	9.00
				:	TOTAL	NA.
1) Our to valle to	a AE dans		1		. —	<del></del>

- Deli very 4-6 weeks ARO or to meet schedule
  Shi ping Costs to ARO or to meet schedule
  All axes extra as applicable.

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Han c	ore Composites.	Authorized Signatu	ira ·		Date
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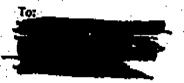
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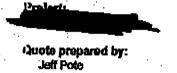
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Hardcore Composites
Operations LLC
618 Lambsons Lane
New Castle, Delaware 19720
302-472-0815 Fax 302-472-0818

Quete i fe,





r		
QUOTE DATE	F.O.B. POINT	TERMS
7/23/04	Nev/ Castle, DE	30% Down, Net 30 upon delivery

QU WITHY	DESCRIPTION	UNIT PRIČE	AMOUNT
5, 48.6-ft	18.5-In FRP Pile		
(45 pi ээ @ 65-ft	Piles meet minimum structural requirements as follows:		
40 pl 15 @ 63-ft	- Bending Stiffness (El) of 2,75 x 10° to in <sup>2</sup>		
1 pl @ 3.5-n)	- Piles to be filled with 6,000 psi concrete		
The Grand	- Wall Thickness 0.25 in minimum		
	Exterior Cost to be Black Epoxy Paint unless customer requests a different color		
	- Straightness to be less than 1.25 in per 10-ft		
. 86	Heavy Duty Driving Tips for Piles	-	4
3 (Tre & Loads)	Shipping		
		SUBTOTAL	-
		TAXES	0.00
		TOTAL	

- Qui 4e valid for 46 days, Del very 12 weeks ARO Shi iping Costs to Florida All exes extra as applicable.

Herr core Composites Authorized Signature

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August 7, 2003 S 03 - 0374

E/ 7827

Tim Linden

Orion Construction

T: (813) 839-8441

F: (813) 831-7498

Re: Pler 12 San Diego

Thank you for the opportunity to provide the following quotation.

**Product** 

Reinforcement

Oty.

Length

FIBERGLASS MARINE FENDER PILES

HARDCORE COMPOSTIE Fender Piles - Option A

12.75" OD x .027" wall Fiberglass Marine Fender Piles that meet spec requirements, including: vinyl ester resin, triaxial

e-glass fabric, inner polyethylene layer, and manufactured using closed resin infusion process.

74 cach 60.00 ft

\$162,350

Total delivered CIF to San Diego, CA:

HARDCORE COMPOSTIE Fender Piles - Option B

12.75" OD  $\times$  0.27" wall Fiberglass Marine Fender Piles that

74 cach 60.00 ft

do not meet all spec requirements.

Total delivered CIF to San Diego, CA:

\$121,280

The above quoted piles are hollow. Contractor will have to precast with concrete. High Density Polyethylene Pipe Sleeves called for Section 02463, Subsection 2.3.2.1 can be ordered directly from the distributer in California. Please contact P&F Distributors @909-596-6887. We recommend the 16" OD, DR 13.5 (13.63" ID)

Sales tax:

Applicable taxes are not included in the above pricing.

Delivery:

To suit construction schedule.

We look forward to the opportunity to work together with you on this project. Please advise should you have any questions or require additional information.

Yours sincerely,

Bryan Maphis

TRELLEBORG

**SEAWARD**, a division of Trelleborg Engineered Products, Inc., 3470 Marphsburg Pike, P.O. Box 98, Clearbrook, VA 22624, USA Phone (540) 667-5191 Pax (540) 667-7987 E-Mail mail@seaward.com Internet www.seaward.com

DEPOSITION
EXHIBIT
265

DEPOSITION

EXHIBIT

AS

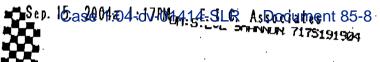
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Ech. 8

TO: 1973315Ø210

P:1/11





Date:

9/15/04

To:

Bob Schmidt, E.I.C.

Phone: 973-315-0200

Fax:

973-315-0218

From:

Steve Shannon

Phone: 717-625-3740 Fax: 717-625-3741

Pages:

11

Subject:

Hardcore Composite Fender Pile Quote

South Jersey Port - Piers 1 & 1a

Bob:

Thank you for taking time to talk with me this morning. For your review, I have

- HC Pile Quote (1 pg.)
- HC Pile Design Guide (4 pgs)
- Lehigh University flexural test report (5 pgs)

As you will see, the delivered price is \$28.70 per lineal foot. That price includes the required HDPE wear sleeve for abrasion protection. Please note, the flexural properties (bending moment and bending stiffness-EI) of the quoted Hardcore Composite Pile well exceed a comparable sized (O.D.) Lancaster Composite pile.

Thanks again for the opportunity to quote this project. Please call me with any questions.

Best Regards,







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Exhibit D

**☑** 029/046

# US Patent No. 6,048,594

Hardcore Product
(Call out letters correspond to attached
Hardcore Specification Data, Composite
Tubular Piling Design Guide, Hardcore
Composite Pile Strengthening Jackets
Document and Photo of Hardcore Product)
Photo shows and Specification Data and
Composite Tubular Piling Design Guide
specifies a 4000 psi compressive strength
concrete infill (A) with a high tensile strength,
fiber reinforced composite tube (B). High
bending load is specified. See bending
moment specifications (H).
Photo shows and Specification Data and
Composite Tubular Piling Design Guide
specifies a fiber reinforced composite tube (B).
Hardcore Composite Pile Strengthening
Jackets Factory Assured Fiber Orientation (C)
specifies an ultimate tensile strength of 63,000
psi.
Photo shows and Specification Data and
Composite Tubular Piling Design Guide
specifies, at (D), FRP composite tubes having
various outside diameters and wall thicknesses
forming a boundary which encloses a space.

**☑** 030/046

Case 1:04-cv-01414-SLR

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Photo shows and Specification Data and a hard core within said space, the hard core Composite Tubular Piling Design Guide having a density of at least 35 pounds per cubic specifies a concrete infill as a hard core (E). foot and a compressive strength of at least Specification Data and Composite Tubular 1500 psi, Piling Design Guide (E) specifies the concrete infill having a compressive strength of no less than 4,000 psi. It is well known that concrete has a density which far exceeds 35 pounds per cubic foot. Typical density is in the range of 140 -145 pounds per cubic foot. Concrete specified for the infill is well known the hard core being formed from a mixture of particulate cementitious material and liquid to be a mixture of particulate cementitious material and liquid. such that when said mixture hardens, said hard Photo shows and Specification Data at (E) (F) core is joined securely to said inside surface of specifies the concrete infill being mechanically said hollow structure. locked to the composite tube. 2. The filled structure of claim 1, wherein Specification Data (E) specifies the concrete said mixture is such that it expands its volume infill to have non-shrink admixtures assuring as it hardens, expansion of the mixture being that a mechanical lock is established between the composite tube and the concrete infill. restrained by the hollow structure and the hard Specification Data, at (I) refers to shrinkage core exerts a force against the inside surface of the hollow structure. compensation. 3. The filled structure of claim 1, wherein Photo shows and Composite Tubular Piling Design Guide, at (D) shows a closed section of the hollow structure is a closed section. a hollow structure. 4. The filled structure of claim 1, wherein Photo shows and Specification Data and the hollow structure is a cylindrical pipe Composite Tubular Piling Design Guide specifies a FRP composite tube (B) fabricated having fiberglass rovings therein. of fiber-reinforced composite material.

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12. The filled structure according to claim
11, wherein said mixture is such that it expands
its volume as it hardens, expansion of the
mixture being restrained by the hollow
structure and the hard core exerts a force
against the inside surface of the hollow
structure.

Specification Data (E) specifies the concrete infill to have non-shrink admixtures assuring that a mechanical lock is established between the composite tube and the concrete infill.

Specification Data, at (I) refers to shrinkage compensation.

**☑** 032/046



#### SPECIFICATION FOR FRP COMPOSITE PILES

#### DESCRIPTION 1.

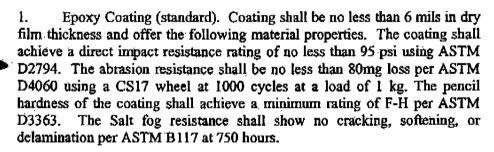
1.01 This work shall consist of furnishing and installing FRP Composite Piles. This work will include all equipment, materials, labor and all else necessary to install the piles as shown on the plans. See plan documents for a pile schedule specifying quantity, diameter, length and other requirements unless included in specification.

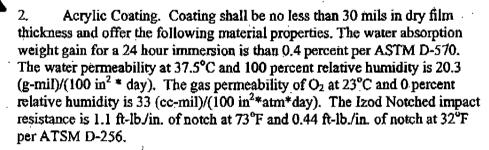
#### 2. **MATERIALS**

#### FRP Composite Tube 2.01



- A. FRP composite tube shall be fabricated of high-strength, fiber-reinforced composite materials by means of VARTM (Vacuum Assisted Resin Transfer Molding). The piles shall be manufactured with vinyl ester resin and stitch bonded fabric reinforcement. The minimum fiber content by volume shall be no less than 50%. Composite tube shall meet all material and performance specifications cited in this document. Composite tube shall be produced by Hardcore Composites (New Castle, DE) or Engineer pre-approved equal.
- В. FRP Composite tube shall be coated with either a minimum 6 mil thick epoxy coating or a minimum 30 mil thick acrylic coating depending on the project requirements. [Engineer to specify].





#### FRP COMPOSITE PILES



- C. FRP composite tubes shall be manufactured with a textured, inner surface. The textured surface will provide a mechanical lock between the tube and filler material, typically concrete. This mechanical lock will minimize slippage between the composite tube and filler material.
- D. FRP composite tubes shall have a minimum wall thickness as follows:

PRODUCT IDENTIFICATION	NOMINAL O.D. (+/- 0.5") (in)	WALL THICKNESS (in)
10-2	10.00	0.182
12-2	12.75	0.182
12-3	12.75	0.273
14-3	14.00	0.273
18-3	18.00	0.273
18-4	18.00	0.364
24-3	24.00	0.273
24-4	24.00	0.364

#### 2.02 Concrete Infill



- A. Concrete infill for FRP Composite Piles shall conform to applicable state or federal specifications.
  - I. The 28 day compressive strength shall be no less than 4,000 psi.
  - 2. Non-shrink admixtures shall be utilized in the mix design to assure that a mechanical lock is established between the composite tube and concrete infill.
- 2.03 FRP Composite Pile
  - A. The FRP Composite Pile, including 4,000 psi compressive strength concrete infill, shall offer ultimate stiffness and moment capacities as shown in the table below.

PRODUCT IDENTIFICATION	NOMINAL O.D. (+/- 0.5") (in)	BENDING STIFFNESS <sup>1</sup> , EI (lb-in <sup>2</sup> )	BENDING MOMENT <sup>2</sup> (in-lb)
10-2	10.00	4.49 x 10 <sup>8</sup>	1.15 x 10 <sup>6</sup>
12-2	12.75	9.78 x 10 <sup>8</sup>	2.04 x 10 <sup>d</sup>
12-3	12.75	1.38 x 10°	2.80 x 10 <sup>6</sup>
14-3	14.00	1.76 x 10 <sup>9</sup>	3.43 x 10 <sup>6</sup>
18-3	18.00	4.59 x 10°	5.66 x 10 <sup>6</sup>
18-4	18.00	5.78 x 10°	7.60 x 10°
24-3	24.00	1.05 x 10 <sup>10</sup>	1.01 x 10 <sup>7</sup>
74_4	24 00	1.34 x 10 <sup>10</sup>	$1.29 \times 10^{7}$

- I. Bending stiffness calculated at 20% of ultimate bending moment
- 2. In practice, piling should not be used at its ultimate moment capacity. A factor of safety should be used. It is recommended that piling be stressed up to 20% of ultimate moment capacity. However, the appropriate factor of safety may vary at the designer's discretion for particular applications.
- 24 inch diameter pile flexural data based on extrapolation of experimental data.

**☑** 034/046

#### FRP COMPOSITE PILES

#### CONSTRUCTION DETAILS 3.

- FRP Composite Piles shall be installed using industry standard methods including 3.01 impact harmmers, vibratory hammers and jetting. The piles shall be driven either hollow or with concrete infill depending on the site-specific geotechical conditions. The piles can also be driven either open ended or with a driving shoe as provided by Hardcore Composites. A standard pipe pile driving helmet or equivalent is used in most applications. [The method of installation and maximum allowable driving stresses shall be specified by the Engineer of Record].
- Once the piles are installed, piles shall be cut at the cut-off elevation shown on the 3.02 plans. Cutting shall be performed by sawing or other means as approved by the Engineer of Record to provide a smooth level cut.
- Depending on the physical properties required, piles may be left unfilled. If the 3,03 project requires the piles be filled, soil and water shall be removed from the inside of the pile to below the point of fixity or as specified by the Engineer of Record. Concrete or other filler material shall then be tremmie placed into the pile in a manner approved by the engineer. [Engineer to determine whether filled or unfilled piles are required].
- When submitting shop drawings for approval, the provisions of the applicable state 3.04 or federal specifications shall apply, with the following modifications:
  - The Contractor shall submit the following shop drawings and supporting A. information for approval:
- ü.
- Proposed FRP composite tube, including bending stiffness and bending moment, concrete specification and certification of compliance with this specification.
  - Proposed concrete mix design, verifying compressive strength and shrinkage compensation,
  - Details for driving helmets, cap blocks and pile cushions and iii. recommendations for pile driving equipment.
  - Handling, transporting and storing recommendations for composite ίv.
  - Proposed concrete supplier. ٧.

## METHOD OF MEASUREMENT

The quantity of piles to be paid for under the work specified for FRP Composite Piles will be the number of linear feet of piles placed in the leads, and installed in accordance with the plans and this specification. No additional measurement for payment will be made for redriving of piles that are forced up by any cause.

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### FRP COMPOSITE PILES

#### 5. BASIS OF PAYMENT

- The unit price bid per linear foot for each of the respective FRP Composite Pile 5.01 items shall include the cost of furnishing all labor (including the manipulation of pile driving equipment and materials), materials, and equipment necessary to complete the work as prescribed in these specifications. No payment will be made for piles rejected in accordance with the requirements listed under sections regarding Defective Piles of the applicable state or federal specifications.
- 5.02 Payment will be made under:

<u>Item No.</u>	<u>Description</u>	<u>Pay Unit</u>
10-2	FRP Composite Pile (2-ply), 10" Dia.	LF
12-2	FRP Composite Pile (2-ply), 12" Dia.	LF
12-3	FRP Composite Pile (3-ply), 12" Dia.	LF
14-3	FRP Composite Pile (3-ply), 14" Dia.	LF
18-3	FRP Composite Pile (3-ply), 18" Dia.	LF
18-4:	FRP Composite Pile (4-ply), 18" Dia.	LF
24-3	FRP Composite Pile (3-ply), 24" Dia.	LF
24-4	FRP Composite Pile (4-ply), 24" Dia.	LF

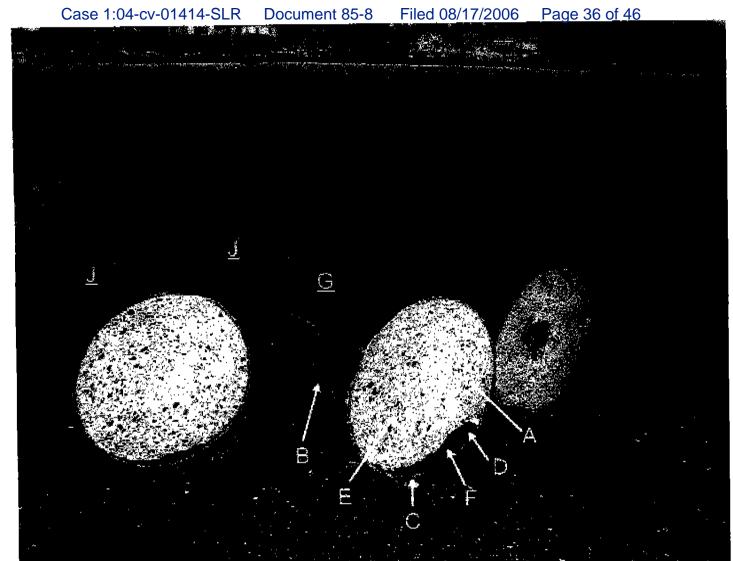


Hardcore Composités

618 Lambsons Lane / New Castle, DE 19720 Phone: 302.442.5900 / Fax: 302.442.5901

www.hardcorecomposites.com

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Exhibit E

# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

LANCASTER COMPOSITE, INC., Plaintiff,

Civil Action No. 04-1414 SLR

**☑** 038/046

٧.

HARDCORE COMPOSITES OPERATIONS, LLC and W. SCOTT HEMPHILL,

Defendants.

#### AFFIDAVIT OF DOUGLAS F. SUESS, P.E.

- I, Douglas F. Suess being duly sworn according to law depose and say as follows::
- I am an Executive Vice President of Whitney Bailey Cox and Magnani, LLC, a full service consulting engineering/architectural firm.
- 2. I am a graduate of the University of Maryland with both Bachelors and Masters degrees in Structural Engineering.
- I am a registered Professional Engineer with over 30 years of experience in the design of building and marine structure
- 4. I have designed and managed projects for marginal wharfs and piers, reefer terminals, tieback bulkheads, the rehabilitation of existing marine structures, and building support facilities.
- 5. I served as past president of both the American Council of Engineering

  Companies (ACEC) of Maryland and the Maryland Chapter of the American Society of Civil

  Engineers (ASCE) and am a Fellow in ACEC.
- I have taught Professional Engineering review courses for the University of Maryland, Baltimore County.

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I have been previously retained and engaged as an expert witness in several 7. matters.

- 8. I have been recognized by a court and testified as an expert witness in at least one matter.
- 9. I am familiar with Hardcore composite tubular pilings as a result of an in house seminar presented to our firm on the Hardcore product as well as a review of their literature.
- 10. I have reviewed Lancaster Composite's U.S. Patent Nos. 5,800,889 and 6,048,594.
- 11. I have reviewed claim charts including attachments prepared by Barley Snyder for Lancaster Composite U.S. Patent Nos. 5,800,889 and 6,048,594 relative to the Hardcore products and I concur with those readings of claims on the Hardcore's products. Specifically, Hardcore's composite tubular pilings include each the elements recited in the claims listed in the claim charts. My concurrence of those claim readings is based on sound engineering principles and my familiarity with the Hardcore products.

Sworn to and Subscribed before me this 30 / day of December, 2004.

12/30/04/SA/1347604

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Exhibit F

08/17/2006 11:52 IFAX → Donna 🛭 Ø041/048

# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

LANCASTER COMPOSITE, INC., Plaintiff,

Civil Action No. 04-1414 SLR

v.

HARDCORE COMPOSITES OPERATIONS, LLC and W. SCOTT HEMPHILL,

Defendants.

#### AFFIDAVIT OF ROBERT H. GREENE

COMMONWEALTH OF PENNSYLVANIA

SS:

COUNTY OF LANCASTER

- I. Robert H. Greene, being duly sworn according to law depose and say as follows:
- I am the President of Lancaster Composite, Inc. ("Lancaster Composite"),
   Plaintiff in the above matter, and I have personal knowledge of the facts set forth in this
   Affidavit.
- 2. The photographs attached to this Affidavit as IMG0413 and IMG0414 were photographs I personally took in April, 2003 on the docks at the Belmar Municipal Marina in Belmar, New Jersey. These photographs are two in a series of six I took on the same day in April, 2003. One or both of the photographs attached to this Affidavit have been attached to and are referred to in the Claims Charts prepared by Lancaster Composite's counsel.
- 3. The photographs depict Hardcore pilings which were, at the time of the photographs, in storage for construction of a new fuel dock at the Belmar Municipal Marina.

- The Belmar Municipal Marina Project and the Hardcore pilings photographed are 4. the subject of the initial suit brought by Lancaster Composite against Hardcore Composites Operations, LLC ("Hardcore Composites") in this Court, indexed at CA No. 03-840 (SLR).
- Since Hardcore Composites has been a direct competitor of Lancaster Composite, 5. I have, on many occasions, observed Hardcore pilings in great detail. Furthermore, I have in my possession pieces of Hardcore pilings. Therefore, I am quite familiar with Hardcore pilings.
- The Hardcore piling tube is easily recognized by the textured fabric that 6. comprises a red-colored inner wall of the piling. The pilings depicted in these photographs contain the textured fabric comprising a red-colored inner wall.
- The Hardcore piling tube is produced by the VARTM process. The filing ports 7. utilized in this process were visible to me when I observed these pilings at the Belmar Municipal Marina and can be seen in the photographs.
- Hardcore is the only piling company to produce its fiberglass tubes by the 8. VARTM process.
- Hardcore is the only competitor of Lancaster Composite whose piling is of the 9. same design and type as Lancaster Composite.
- In addition to my personal observations, I confirmed through the owner's 10. representative, Birdsall Engineering, that the pilings at the Belmar Municipal Marina were manufactured by Hardcore Composites.
- The pilings depicted in these photographs are Hardcore pilings. Furthermore, the 11. pilings depicted in these photographs are representative of the infringing pilings manufactured, sold, and offered for sale by Hardcore Composites.

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**☑** 043/046

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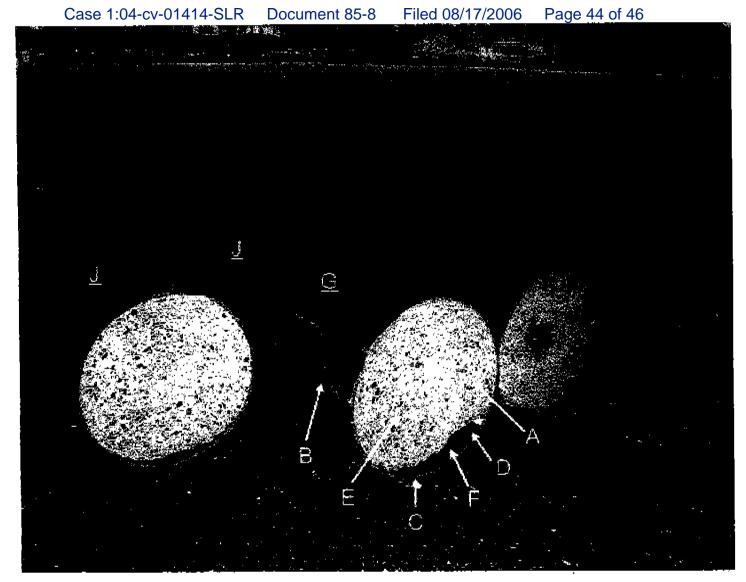
Sworn to and Subscribed before me this <u>2714</u> day of December, 2004.

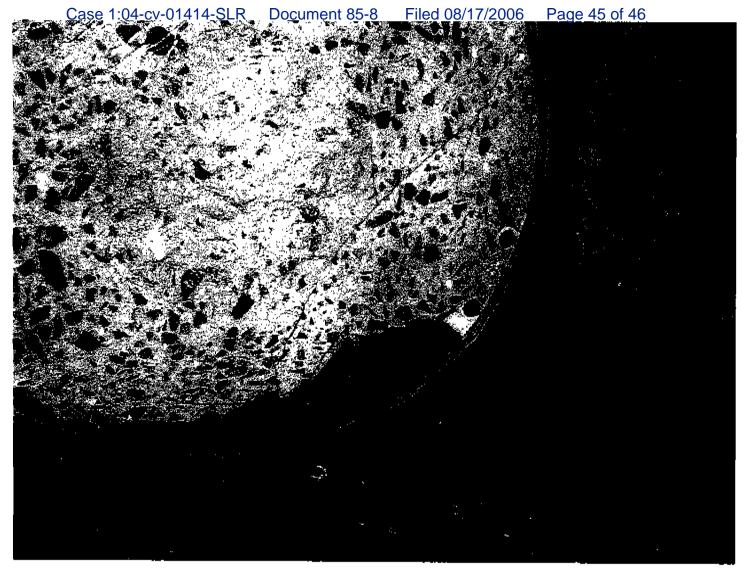
gammet f Notary Public

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal
Sharon K. Flemming, Notary Public
City Of Lancaster, Lancaster County.
My Commission Expires Nov. 23, 2006

Member, Pennsylvania Association Of Notaries





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## **CERTIFICATE OF SERVICE**

I, Kevin A. Guerke, Esquire, hereby certify that on August 17, 2006, I caused a copy of the foregoing Appendix in Support of Motion of Plaintiff Lancaster Composite, Inc.'s Motion for Partial Summary Judgment on Patent Infringement Against W. Scott Hemphill to be served via U.S. First Class Mail upon the following:

W. Scott Hemphill 517 Riblett Lane Wilmington, DE 19808

	/s/ Kevin A. Guerke
By:	
•	Kevin A. Guerke, Esquire (#4096)
	kguerke@svglaw.com